



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

NOV 15 1999

MEMORANDUM

SUBJECT: Disposal of Wood Treating Wastes from the
Arkwood Inc., Superfund Site

FROM: *Chmurski*
Randall E. Brown, Chief
RCRA Enforcement Branch (6H-C)

TO: Larry Wright, Acting Chief
Superfund Enforcement Branch (6H-H)

This memorandum is in response to your request for assistance in determining whether the wastes at the Arkwood site are "dioxin" wastes which would require six nines destruction if incinerated.

In a letter dated March 4, 1985, from John Skinner (Office of Solid Waste) to Walter Talarek (American Wood Preserves Institute), an interpretation of the applicability of the dioxin rule to wastes generated at wood-treating facilities stated that most wastes from these operations would not be considered to be "dioxin" wastes unless such wastes met the specific listings of F021, F027, or F028 (see attachment).

In conversations between Ruth Izraeli and Jerry Truitt of my staff it appears that the waste materials at the Arkwood site would not be considered to be "dioxin" wastes. If you have any questions, please contact Jerry Truitt of my staff.

Attachment

186706

